

Kelly H. Dove, Esq.
Nevada Bar No. 10569
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Tel. (702) 784-5200
Fax. (702) 784-5252
Email: kdove@swlaw.com

Attorneys for Defendant Plain Green, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DOUGLAS EDER,

Plaintiff,

v.

CLARITY SERVICES, INC.; and PLAIN
GREEN LLC,

Defendants.

Case No.: 2:22-cv-00904-CDS-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(First Request)

Plaintiff Douglas Eder (“Plaintiff”) and Defendant Plain Green, LLC (“Plain Green”) (collectively, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Plain Green’s deadline to file its response to Plaintiff’s Complaint [ECF No. 1] from August 5, 2022, to August 26, 2022 for the following reasons:

1. Plaintiff filed his Complaint on June 6, 2022 [ECF No. 1].
2. Plain Green was served with the Summons and Complaint on July 15, 2022.
3. Plain Green’s response to the Complaint is currently due on August 5, 2022.
4. Plain Green needs additional time to adequately prepare its response to the Complaint.

1 5. This extension request is sought in good faith and is not made for the purpose of
2 delay.

3 THEREFORE, the Parties respectfully request an extension for Plain Green to file its
4 response to the Complaint from August 5, 2022, to and including August 26, 2022.

5 Dated: August 3, 2022

Dated: August 3, 2022

6 KIND LAW

SNELL & WILMER L.L.P.

7 By: /s/ Gerardo Avalos

By: /s/ Kelly H. Dove

Michael Kind, Esq.

Kelly H. Dove, Esq.

Nevada Bar No. 13903

Nevada Bar No. 10569

8860 South Maryland Parkway, Suite 106

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, Nevada 89123

Las Vegas, NV 89169

10 George Haines, Esq.

Attorneys for Defendant Plain Green, LLC

Nevada Bar No. 9411

Gerardo Avalos, Esq.

Nevada Bar No. 15171

12 FREEDOM LAW FIRM

8985 S. Eastern Ave., Suite 350

Las Vegas, Nevada 89123

14 *Attorneys for Plaintiff Douglas Eder*

15 **ORDER**

16 **IT IS SO ORDERED**

17 **DATED:** 2:50 pm, August 05, 2022

18 

19 **BRENDA WEKSLER**

20 **UNITED STATES MAGISTRATE JUDGE**

Snell & Wilmer

L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT** was served on August 3, 2022, by the method indicated:

☐

BY FAX: by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

☐

BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

☐

BY OVERNIGHT MAIL: by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☐

BY PERSONAL DELIVERY: by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.

☒

BY ELECTRONIC SUBMISSION: submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

☐

BY EMAIL: by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

/s/ Maricris Williams

An employee of Snell & Wilmer L.L.P.